

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

SHANITA NICHOLSON,

Plaintiff,

vs.

TRANSWORLD SYSTEMS INC.,

Defendants.

Case No. 1:20-CV-01771-SO

Judge Solomon Oliver

**DEFENDANT'S UNOPPOSED MOTION FOR REMAND AND
INCORPORATED MEMORANDUM OF LAW**

Defendant, Transworld Systems Inc. ("TSI"), through counsel and pursuant to the Federal Rules of Civil Procedure, files this Unopposed Motion for Remand and incorporated memorandum of law in support. This case was originally filed in the State of Ohio, Cuyahoga County Court of Common Pleas, Case No. CV20931232. On August 11, 2020, TSI removed this case to this Court. Based on information learned after the removal, TSI has determined the removal was not timely filed. Accordingly, TSI requests the Court remand the case to the State of Ohio, Cuyahoga County Court of Common Pleas.

Respectfully submitted,

/s/ James O'Connor

James O'Connor, Esq. (0063428)

Franklin C. Malemud, Esq. (0068356)

Reminger Co. LPA

101 W. Prospect Ave., Suite 1400

Cleveland, OH 44115-1093

Tel: 216-430-2225

E-mail: Joconnor@reminger.com
fmalemud@reminger.com

*Attorneys for Defendant
Transworld Systems Inc.*

CERTIFICATE OF SERVICE

I certify that on August 17, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system, including plaintiff's counsel via direct email as described below. Parties may access this filing through the Court's system.

James S. Wertheim, Esq.
James S. Wertheim LLC
24700 Chagrin Blvd., Suite 309
Beachwood, OH 44122
wertheimjim@gmail.com

By: /s/ James O'Connor
James O'Connor (0063428)